

UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF VIRGINIA
RICHMOND DIVISION

In re)
)
CIRCUIT CITY STORES, INC.)
)
Debtor.) No. 08-35653-KRH
) Chapter 11
_____)

MOTION TO APPEAR PRO HAC VICE

Pursuant to Local Bankruptcy Rule 2090-1 (E)(2), Daniel M. Press ("Movant") hereby moves(the "Motion") this Court to enter an Order authorizing Lewis W. Siegel to appear *pro hac vice* before this Court to represent B. R. Fries & Associates, LLC in the above captioned case (and in particular, in Adversary Proceeding No. 10-03382. In support of the Motion, the Movant states as follows:

1. Movant is an attorney with Chung & Press, P.C. and is a member in good standing of various bars, including the Bar of the Commonwealth of Virginia. Movant is admitted to practice before various federal courts, including the United States Bankruptcy Court for the Eastern District of Virginia. There are no disciplinary proceedings pending against Movant in any jurisdiction or court in which he is admitted to practice.

2. Mr. Siegel is a sole practitioner with offices in New York, NY. He is a member in good standing of the bar of New York and is admitted to practice within the Court of Appeals for the

Daniel M. Press, VSB# 37123
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McLean, VA 22101
(703) 734-3800
Movant/Local Counsel for
B. R. Fries & Associates, LLC

Second Circuit, as well as the District and Bankruptcy Courts for the Southern and Eastern Districts of New York. There are no disciplinary proceedings pending against Mr. Siegel in any jurisdiction or court in which he is admitted to practice (Mr. Siegel's Application to Qualify as a Foreign Attorney is attached and incorporated hereto).

3. Movant requests that this Court authorize Mr. Siegel to file pleadings in, to appear and be heard at hearings concerning, and to otherwise participate in, the above-captioned cases on behalf of B. R. Fries & Associates, LLC, subject to the requirements and limitations noted in Local Bankruptcy Rule 2090-1(E)(2).

4. Movant shall serve as co-counsel with Mr. Siegel.

5. Pursuant to Local Bankruptcy Rule 9013-1(G), and because there are no novel issues of law presented in this Motion, Movant requests that this Court waive the requirement that all motions be accompanied by a written memorandum of law.

6. Notice of this Motion has been given to all persons receiving electronic notice in the above-captioned bankruptcy case, including the United States Trustee.

WHEREFORE, Movant respectfully requests that this Court enter an Order authorizing Mr. Siegel to appear *pro hac vice* on behalf of B. R. Fries & Associates, LLC in the above-captioned case and associated adversary proceeding in substantially the same form as Exhibit A attached hereto and grant such further relief as the Court deems proper.

Dated: November 27, 2011.

Respectfully submitted,

/s/ Daniel M. Press
Daniel M. Press, VSB# 37123
CHUNG & PRESS, P.C.
6718 Whittier Avenue, Suite 200
McLean, Virginia 22101
(703) 734-3800

Lewis W. Siegel
Pro Hac Vice Pending
355 Lexington Avenue – Suite 1400
New York, NY 10017
(212) 481-1300

CERTIFICATE OF SERVICE

This is to certify that on this 27th day of November, 2011 a true and complete copy of the foregoing Motion was filed and served electronically using the Court's ECF System to all parties receiving such notice.

/s/ Daniel M. Press
Daniel M. Press

UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF VIRGINIA
RICHMOND DIVISION

APPLICATION TO QUALIFY AS A FOREIGN ATTORNEY UNDER
LOCAL BANKRUPTCY RULE 2090-1(E)(2)

In Case No.: 08-35653, * Case Name Circuit City Stores, Inc.

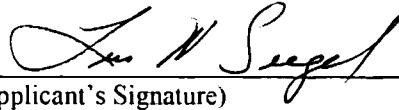
PERSONAL STATEMENT

FULL NAME (no initials, please) Lewis W. Siegel
Bar Identification Number Not Applicable State New York
Firm Name Lewis W. Siegel, Esq.
Firm Phone # 212-481-1300 Direct Dial # 212-481-1300 FAX # 212-696-4064
E-Mail Address LWS@LWSEsq.com
Office Mailing Address 355 Lexington Avenue - Suite 1400, New York, NY 10017
Name(s) of federal court(s) in which I have been admitted USDC - SDNY, EDNY; USBC - SDNY, EDNY: 2nd Cir Ct App

I certify that the rules of the federal court in the district in which I maintain my office extend a similar *pro hac vice* admission privilege to members of the bar of the Eastern District of Virginia.

I have not been reprimanded in any court nor has there been any action in any court pertaining to my conduct or fitness as a member of the bar.

I hereby certify that, within 90 days before the submission of this application, I have read the Local Rules of this Court and that my knowledge of the Federal Rules of Civil Procedure, the Federal Rules of Bankruptcy Procedure, and the Federal Rules of Evidence is current.


(Applicant's Signature)

I, the undersigned, do certify that I am a member of the bar of this Court, not related to the applicant; that I know the applicant personally, that the said applicant possesses all of the qualifications required for admission to the bar of this Court; that I have examined the applicant's personal statement. I affirm that his/her personal and professional character and standing are good, and petition the court to admit the applicant *pro hac vice*.

/s/ Daniel M. Press 11/27/11
(Signature) (Date)
Daniel M. Press
(Typed or Printed Name)

**Pro hac vice* admission in a case shall include an adversary proceeding(s) in the case.

UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF VIRGINIA
RICHMOND DIVISION

In re _____)
)
CIRCUIT CITY STORES, INC.) No. 08-35653-KRH
)
Debtor.) Chapter 11
)
_____)

ORDER GRANTING ADMISSION PRO HAC VICE OF
LEWIS W. SIEGEL

Upon the Motion for Admission to Practice Pro Hac Vice on Behalf of Lewis W. Siegel (the “Motion”), which seeks entry of an order pursuant to Local Rule 2090-1(E)(2) permitting Lewis W. Siegel (“Mr. Siegel”), of the New York bar, to appear and practice *pro hac vice* on behalf of B. R. Fries & Associates, LLC, and for good cause shown, it is hereby

ORDERED that the Motion is GRANTED, and it is further

ORDERED that Mr. Siegel is hereby admitted to practice before this Court *pro hac vice* in the above-captioned jointly administered chapter 11 cases and in all associated adversary proceedings in accordance with Local Rule 2090-1(E)(2).

Dated: _____

Judge, U.S. Bankruptcy Court

Entered on Docket: _____

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Chung & Press, P.C.
6718 Whittier Ave., Suite 200
McLean, VA 22101
(703) 734-3800
Movant/Local Counsel for
B. R. Fries & Associates, LLC

I ASK FOR THIS:

/s/ Daniel M. Press
Daniel M. Press, VSB 37123
CHUNG & PRESS, P.C.,
6718 Whittier Ave., Suite 200
McLean, VA 22101
(703) 734-3800
Movant/Local Counsel for
B. R. Fries & Associates, LLC

Local Rule 9022-1(C) Certification

The foregoing Order was endorsed by and/or served upon all necessary parties pursuant to Local Rule 9022-1(C).

/s/Daniel M. Press
Daniel M. Press

Copies to:

Daniel M. Press, Esq. (by CM/ECF)

Lewis W. Siegel, Esq.
355 Lexington Avenue – Suite 1400
New York, NY 10017